CERTIFICATION PROPOSAL

WASTEWATER TREATMENT PLANT IMPROVEMENTS
HOLTVILLE, CALIFORNIA

Submitted: January 17, 2014

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INDEX

EXECUTIVE SUMMARY

WASTEWATER TREATMENT PLANT IMPROVEMENTS HOLTVILLE, CALIFORNIA

Project: The Project consists of the rehabilitation and upgrade of the existing wastewater treatment plant (WWTP) to meet discharge limitations for ammonia and other pollutants for the city of Holtville, CA (the "Project").

Project Objective: The purpose of this Project is to eliminate exposure to inadequately treated wastewater discharges by the rehabilitation and upgrade of the existing non-compliant WWTP to reduce ammonia and other pollutant levels to meet effluent discharge requirements, contributing to the protection of aquatic ecosystems, the improvement of water quality in the receiving waters and the reduction of the risk of waterborne diseases.

Expected Project Outcomes: The Project is expected to generate environmental and human health outcomes related to the following:

- Improved wastewater treatment capacity (0.85 MGD) to address inadequately treated wastewater discharges currently released to an impaired water body, and
- Improved wastewater treatment service for 100% of the system's 1,279 existing residential connections, and
- Improved wastewater effluent quality (ammonia and biochemical oxygen demand) below or equal to permit limits, and
- A wastewater treatment facility in full compliance with all applicable laws, rules and regulations.

Population Benefited: 6,594 residents of Holtville, CA, and the extended service area.[1]

Sponsor: City of Holtville, CA.

Project Cost: US$11,017,300.

[1] Source: Calculated based on the existing residential units served by the WWTP multiplied by 3.5 persons per household.

Uses and Sources of Funds:

Uses	Amount	%
Construction, contingencies, supervision and other	$11,017,300	100.0
TOTAL	**$11,017,300**	**100.0**
Sources	**Amount**	**%**
CWSRF-California (loan)	$3,457,390	31.4
CWSRF-California (grant)	4,000,000	36.3
NADB-BEIF (grant)	3,559,910	32.3
TOTAL	**$11,017,300**	**100.0**

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1. ELIGIBILITY

Project Type

The Projects falls within the eligible category of wastewater.

Project Location

The Project to improve the City of Holtville wastewater treatment plant is located in the in Imperial County, California, approximately 3 miles northwest of the City which lies approximately 12 miles north of the U.S.-Mexico border. The Project is in the border region defined as within 100 kilometers (62.5 miles) of the U.S.-Mexico international border.

Project Sponsor and Legal Authority

The public-sector Project sponsor is the City of Holtville, CA (the "Sponsor"). Pursuant to the California Government Code, Title 4, Division 3, Part 2, Chapter 11, Section 38900, Holtville has legal authority to operate and maintain their wastewater system. The City of Holtville is authorized to provide utility services to the community and is responsible for developing the WWTP infrastructure improvement project.

2. CERTIFICATION CRITERIA

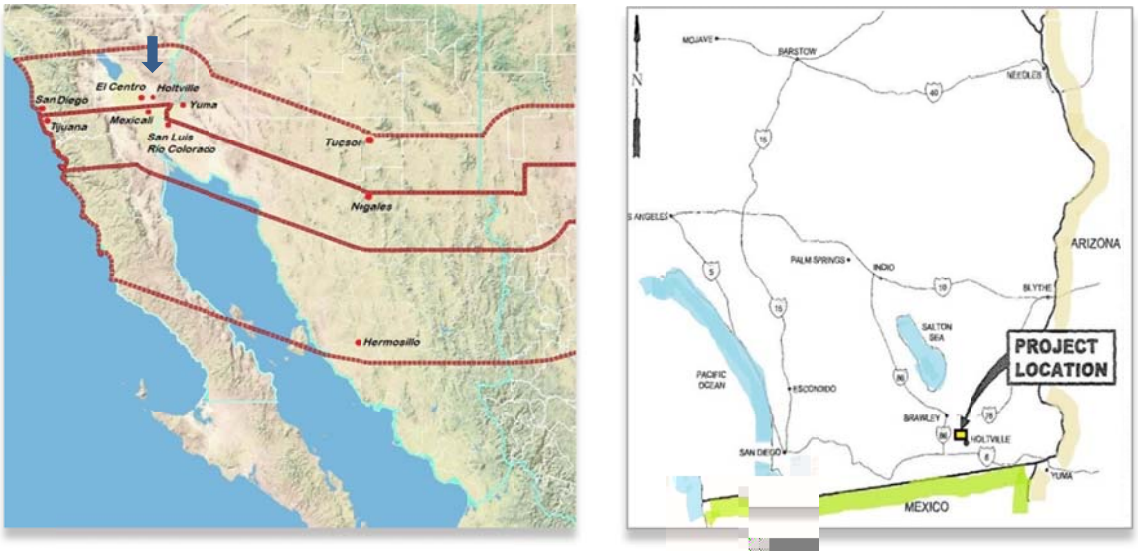
2.1 TECHNICAL CRITERIA

2.1.1. Project Description

Geographic Location

The City of Holtville is located in the southern portion of the Imperial Valley in the arid Sonoran Desert of Southeastern California. The city is roughly bounded by Towland Road and Grape Avenue to the east; the Alamo River to the south; Melon and Tamarack Avenues to the west and Ninth and Tenth Streets to the north. The wastewater service area, including the City, is approximately 1.44 square miles. The City is located approximately 53 miles west of the Colorado River/Arizona border and 127 miles east of San Diego, California. Figure 1 shows the location of the community.

Figure 1
PROJECT VICINITY MAP



General Community Profile

According to U.S. Census Bureau, in 2010, the city of Holtville had a population of 5,939 residents. For 2013, based on the existing residential units for wastewater service and a person per household of 3.5, the current population can be estimated as 6,017.

Holtville is known as the Carrot Capitol of the World. The community's major employer and primary driving economic force is agriculture with 30% of the workforce employed in this sector. Retail trade, transportation and warehousing, and construction make up the next highest employment sectors at 8% each.

The status of public services in the Holtville service area is described in Table 1.

Table 1
BASIC PUBLIC SERVICES AND INFRASTRUCTURE

Water System	
Service coverage:	100%
Water supply source:	Surface water
Number of hookups:	1,486 (1,296 residential/190 commercial)
Wastewater Collection System	
Service coverage:	98.4%*
Number of connections:	1,372 (1,279 residential**/93 commercial)
Wastewater Treatment	
Service coverage:	100%
Treatment facilities:	0.85 MGD plant with a Modified Ludzack-Ettinger (MLE) treatment system will be rehabilitated and upgraded with a BIOLAC^{tm} Wave Oxidation System with the proposed Project.
Solid Waste	
Solid waste collection:	100%
Final disposal:	Landfill
Street Paving	
Coverage:	100%

* The Residential Wastewater Collection Project certified in May 2013 and currently under construction will add 23 new residential sewer connections that will bring the service coverage to 100%.
**Considering multi-family connections, the total residential units are estimated to be 1,884.

Source: City of Holtville, March 2013.

The proposed Wastewater Treatment Plant (WWTP) Improvement Project will serve a broader population base than only those users within the incorporated City of Holtville. The City's WWTP provides sewer treatment services to City residents, residents located immediately outside the incorporated City boundaries, and residents located at the Barbara Worth Country Club, within an unincorporated area of Imperial County. The 1,279 residential connections include 1,147 from the City, 86 from the Barbara Worth Country Club, and 46 from the unincorporated areas. Currently, the WWTP serves 1,884 residential units, which considers multiple family connections. The method used to calculate the benefitted population for the Project multiplies the number of current residential units (1,884) by the average household size (3.5 PPH) or 6,594 persons.

Project Scope

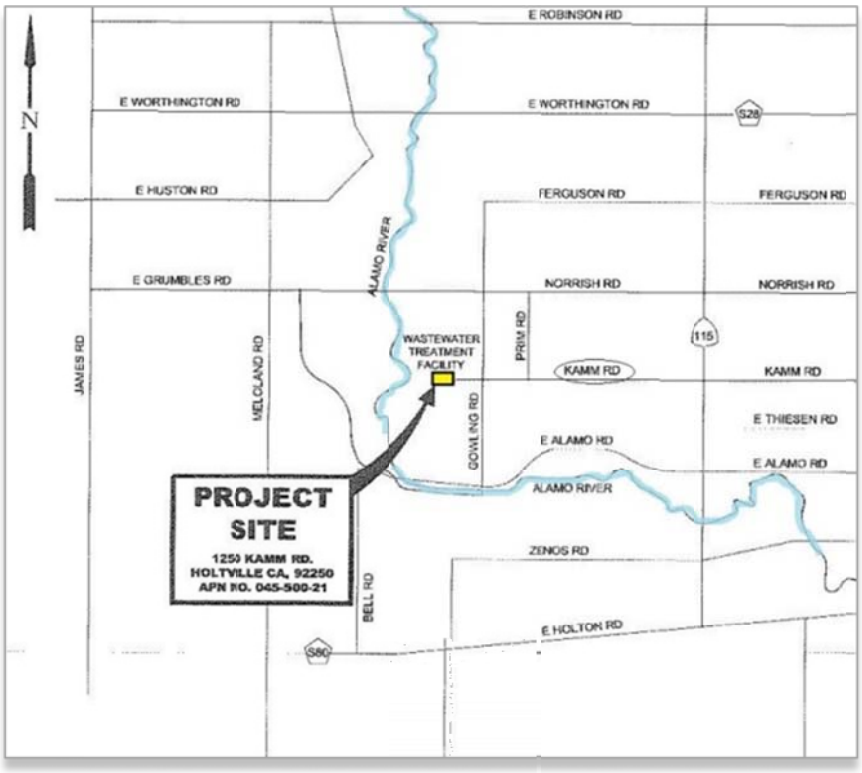
The proposed Project will improve the existing 0.85 MGD WWTP to meet discharge requirements for ammonia and other pollutants. Current flows into the 0.85 MGD plant are averaging 0.65 MGD. Existing facilities will be rehabilitated and new components constructed. These will include the installation of an automatic bar screen and the Single Cell Activated Sludge system with high-efficiency moving flexible aeration chains to improve treatment

effectiveness. The improved WWTP will provide wastewater treatment to 100% of the service area including the city of Holtville.

In its current condition, the WWTP cannot comply with the ammonia requirements which allow for monthly average of 1.9 mg/L and maximum daily of 3.6 mg/L and discharges the non-complying effluent into the Pear Drain which drains to the Alamo River and to the Salton Sea. The Alamo River and Salton Sea are listed as impaired for nutrients such as ammonia. In order to be able to comply with the NPDES ammonia discharge limits, the WWTP must be upgraded and rehabilitated extensively including the construction of new components, which is the primary objective of the Project. These conditions allowed the Project to be selected under Category 2 requirements for U.S.-Mexico Border Water Infrastructure funding provided by EPA and administered by BECC and NADB.

Figure 2 below reflects the general location of the proposed infrastructure.

Figure 2
Wastewater Plant Location in Holtville, CA



The final design has been completed, therefore, it is estimated that once procurement of construction contracts is completed and the notice to proceed is given, it will take approximately 17 months to complete construction.

Table 2
PROJECT SCHEDULE

Key Milestones	Status
Procurement	Anticipated: 1st & 2nd quarter of 2014
Construction period	17 months from Notice to Proceed (NTP)

2.1.2. Technical Feasibility

Design Criteria

The City of Holtville adopted a comprehensive set of Standard Details and Specifications which were adopted by the Holtville City Council per Resolution Number 05-22 on June 13, 2005. The City of Holtville Standard Details and Specifications contain Sanitary Sewer Infrastructure Design Guidelines, General Conditions, Submittal Requirements, Geotechnical Testing Requirements and Sanitary Sewer Improvement Standard Details. Additionally, the design considers the codes and regulations of the State of California Department of Transportation Standard Specifications (latest edition); Standard Specification for Public Works Construction (Green Book latest edition); and the Occupational Safety and Health Act. If agency requirements conflict, the most stringent shall apply.

Selected Technology

The current National Pollutant Discharge Elimination System (NPDES) Permit (Order No. R7-2011-0020) for the Holtville WWTP contains stringent ammonia nitrogen removal requirements. The maximum average monthly ammonia concentration in the plant effluent was reduced to a monthly average of 1.9 mg/L or lower (3.6 mg/L maximum daily) beginning on May 19, 2009. The existing trickling filter process has a limited capacity to remove ammonia and therefore, improvements to the WWTP are required.

A Preliminary Engineering Report (PER) was prepared for the Project in accordance with requirements of potential funders including the requirements of the State of California-Clean Water State Revolving Fund (CWSRF), the U.S.-Mexico Border Water Infrastructure Program and the City of Holtville. Technical alternatives were evaluated based on the following factors:

- Initial construction costs
- Land requirements
- Constructability
- Ease of O&M
- Power requirement
- Sludge stabilization

Plant hydraulic calculations were performed for two flow scenarios: the design flow / Average Dry Weather Flow (ADWF) of 0.85 MGD, and the peak flow of 2.0 MGD. The design influent wastewater characteristics based on analysis of the wastewater influent monitoring data are

summarized below in Table 3. Effluent quality targets have also been listed in this table. The effluent ammonia concentrations are based on the NPDES permit limit.

Table 3
PLANT WASTEWATER CHARACTERISTICS FOR PROCESS DESIGN

Design Parameter	Influent	Effluent	Remarks
Extended Aeration System			
Flow, MGD	0.85	0.85	Plant capacity
Influent BOD5, mg/L	300	15	2007 to 2010 monitoring data
Influent TSS, mg/L	861	15	2007 to 2010 monitoring data
Influent TKN-N, mg/L	45	-	Sample analysis data in 2010
Influent NH3 -N, mg/L	35	-	Sample analysis data in 2010 influent
		1.9	30 day average limit effluent
		3.6	Daily maximum effluent

The PER evaluated the existing WWTP facilities and the findings were reported in Section 4.3 of the Preliminary Engineering Report (PER). Based on the condition of the existing process equipment, the PER recommended to rehabilitate some existing infrastructure and to build some new facilities. Facilities to be rehabilitated include the effluent pump stations, UV disinfection system, and stormwater tanks. The new facilities recommended include: a septage receiving station, headwork's unit, single BIOLAC basin, blower building, secondary clarifiers, new aeration basin, and sludge management equipment, among others.

The following alternatives for process upgrades were evaluated for ammonia removal:

- Complete Mix Activated Sludge Tank + Clarifiers to nitrify Trickling Filter effluent located between the Existing Secondary Clarifiers and Continuous Backwash Up-flow Filters,
- Moving Bed Biofilm Reactor (MBBR) to nitrify Trickling Filter Effluent located between the Trickling Filter and Existing Secondary Clarifiers,
- Moving Bed Biofilm Reactor (MBBR) to provide secondary treatment with ammonia removal, bypassing the existing trickling filter and located between the Existing Primary, Clarifiers and Existing Secondary Clarifiers,
- Single Cell Extended Aeration System with Integrated Secondary Clarifier and Wave Oxidation System located between the new Headworks and Continuous Backwash Up-flow Filters.

After evaluating cost, site constraints, power consumption, process performance, and other factors, the single cell extended aeration system with a BIOLAC^{tm} Wave Oxidation was selected. This system provided the best alternative for ammonia removal and effluent compliance. A regular extended aeration system can handle only nitrification; whereas, extended aeration with

BIOLAC^{tm} wave oxidation can also oxidize ammonia into nitrate using alternating oxic - anoxic waves to remove nitrates as gaseous nitrogen.

A new operations building was also included in this Project. The existing building is approximately 40 years ago, and it would have required extensive modification to meet various code requirements and energy efficiency guidelines. These modifications would have had a comparable cost to constructing a new building.

2.1.3. Land Acquisition and Right-of-way Requirements

Since all proposed improvements can be constructed on the existing WWTP site, there is no need for additional land. There are no pending land acquisition or right-of-way requirements.

2.1.4. Management and Operations

The Public Works Department is one of the largest departments in the City's organizational structure with 12 full-time employees and 1 part-time employee. The department has a municipal services division and an engineering division that provides several services including operation and maintenance of the wastewater treatment plant. The City is supported by a contracted City Engineer and planning staff from The Holt Group.

The City has operation and maintenance manuals and procedures in place that include the essential tasks necessary to ensure the proper operation and maintenance of the plant. The City operates and maintains the sanitary sewer collection system, sanitary sewer outfall pipeline and Holtville Municipal Wastewater Treatment Plant. An updated O&M manual will be developed to guide future upkeep of the improved WWTP.

A review of the impacts to the operation and maintenance resources with the implementation of the new Project was conducted. The extended aeration with Biolac® Wave Oxidation system alternative showed the lowest budgetary annual electric cost due to less blower operation in the aeration basin (sequencing aeration for nitrification-denitrification) and no aerobic digester operation. To support the financial sustainability of the investment, repair and replacement reserves will be required. The sponsor will demonstrate the appropriate funding and structure of accounts as a condition of receiving grant funds.

In accordance with funding program requirements, the sponsor is responsible for demonstrating the regular application of a pretreatment program. The City of Holtville established its program by Ordinance 370, Regulating Sewer Use, Sewer Construction and Industrial Wastewater Discharges, that was adopted by the City on July 13, 1981. The City implements its existing pretreatment under the approval and oversight of the State of California Colorado River Basin Regional Water Quality Control Board.

2.2 ENVIRONMENTAL CRITERIA

The purpose of the Projects is to improve the quality of the WWTP effluent eliminating the discharge of inadequately treated wastewater. The wastewater treatment plant has experienced persistent problems with effluent toxicity resulting from high ammonia levels associated with high organic loadings. Also, the non-compliant effluent impacts the Pear Drain, Alamo River and the Salton Sea, which are listed as impaired water bodies for nutrients. This situation represents an environmental risk from direct discharge and/or infiltration in the existing water and groundwater resources, and nearby canals.

2.2.1. Compliance with Applicable Environmental Laws and Regulations

Applicable Laws and Regulations

The Projects are subject to the following formal environmental clearance processes:

- *National Environmental Policy Act (NEPA)*: In considering funding from the US-Mexico Border Water Infrastructure Program, the Projects were reviewed in accordance with the U.S. National Environmental Policy Act (NEPA), 42 USC §§4321-4370f and Council of Environmental Quality regulations, 40 CFR § 1508.4,

- *California Environmental Quality Act (CEQA)*: The CEQA was adopted in 1970 and incorporated into the Public Resources Code §§21000-21177. Its purpose is to inform governmental decision-makers and the public about the potentially significant environmental effects of proposed activities; require changes in projects through the use of alternatives or mitigation measures when feasible; and disclose to the public the reasons why a project was approved if significant environmental effects are involved. CEQA applies to projects undertaken, funded or requiring an issuance of a permit by a public agency.

Environmental Studies and Compliance Activities

Since the City of Holtville is proposing to rehabilitate and upgrade its existing WWTP to meet the wastewater discharge requirements, EPA Region 9 found that this Project (proposed action) is eligible for exclusion for detailed environmental review under Title 40, Chapter 1, Subchapter A, Part 6, Subpart B, Section 6.204 of the Code of Federal Regulations (40 CFR §6.204 (a) (1) (ii) (iii)). The Categorical Exclusion was signed by the Water Division of EPA Region 9 on January 4, 2013 and the NEPA process was completed.

Also, in accordance with Title 14, Chapter 3, Article 9, Section 15301 (b) of the California Code of Regulations, the project fits the description of an existing public utility service facility and it can be considered as a Categorical Exemption since the City is the lead agency for CEQA. No other approval was necessary. The Notice of CEQA Exemption from the City of Holtville, an authorized CEQA agent, was sent to Office of Planning and Research of the State of California on November 29, 2010.

Pending Environmental Tasks and Authorizations

There are no formal environmental authorizations pending.

Compliance Documentation

The following formal authorizations have been obtained for the Project:

- Categorical Exclusion signed by EPA Region 9 on January 4, 2013.
- CEQA Notice of Determination (NOD) and Mitigated Negative Declaration (MND) filed by Imperial County for Conditional Use Permit (CUP) in October, 2012.
- Notice of Exemption from CEQA signed on November 29, 2010 by the City of Holtville.

2.2.2. Environmental Effects/Impacts

Existing Conditions and Project Impact-Environmental

The Holtville Wastewater Treatment Plant (WWTP) discharge does not meet permit requirements for ammonia (nutrient), copper, e-coli, and nickel. The ammonia toxicity levels exceeded the previous maximum daily limitation of 34 mg/L and the monthly average limit of 23 mg/L during the period 2003 to 2009. The allowable limits for ammonia were reduced on May 19, 2009 to a maximum daily of 3.6 mg/L and the average monthly to 1.9 mg/L. Violations continued and between February and October of 2013, the current daily maximum of 3.6 mg/L was violated every month by a range of readings between 5.04 – 16.24 mg/L.

Also, the current effluent discharges pollute the Pear Drain, which is a tributary to the Alamo River which disembogues into the Salton Sea. The Pear Drain, Alamo River and Salton Sea are all impaired bodies of water under the Clean Water Act Section 303(d). The Pear Drain is also home to the Fathead Minnow. The Fathead Minnow is quite tolerant of turbid, low-oxygenated water, and can be found in muddy ponds and streams that might otherwise be inhospitable to other species of fish. The current effluent is at toxic levels for this species and it is of concern for other fish and wildlife in the affected water bodies. Effluent discharges eventually end up at the Salton Sea which is one of the most diverse avian compositions in the United States as well as a host of endangered and other wildlife species.

The RWQCB issued a Cease and Desist Order to the City of Holtville on January 20, 2011 for effluent discharges limit violations and communicated a rigorous compliance schedule. The City is subject to fines if it does not comply with the stringent ammonia requirements, within the stipulated timeframe. The Cease and Desist Order established a timeline requiring the City's WWTP to be in compliance with its NPDES permit by August 2014 which has been extended to December 31, 2015.

The Wastewater Treatment Plant Improvement Project will achieve the following objectives:

1) Comply with the NPDES Permit No. CA0104361
2) Comply with the RWQCB's Cease and Desist Order.

3) Improve the quality of effluent discharges and thus reduce environmental impacts.

4) Maintain affordable sewer rates for a disadvantaged community - Much of the city's population is heavily dependent on Supplemental Security Income (SSI) and is on a fixed income. This Project, as proposed, would meet the objective of maintaining affordable sewer rates for an economically-challenged community.

Mitigation of Risks

Although implementation of the Projects will have no significant adverse impacts on the environment, mitigation measures were established to address temporary, minor adverse impacts during construction. Potential impacts during construction include the following:

- The local air basin will be temporarily impacted by fugitive dust and emissions of carbon monoxide, nitrous oxide and sulfur dioxide emissions due to vehicles and equipment used during construction.
- Noise levels may be elevated during construction activities. This impact is short in duration and concentrated to the work area and will include temporary roadway blockages; as well as presence of workers in the area.

In summary, the mitigation measures include the Best Management Practices (BMP) and compliance with local ordinances to reduce the temporary impacts of construction.

Natural Resources Conservation

The Project contributes to natural resource conservation by reducing environmental deterioration and risks of groundwater and surface waters contamination by improving the wastewater treatment process.

No-action Alternative

The no-action alternative was not considered viable since the existing effluent from the facility does not meet permit requirements for ammonia (nutrient), copper, e-coli, and nickel; and it discharges to the Pear Drain, the Alamo and the Salton Sea, designated as impaired water bodies. Additionally, the RWQCB Cease-and-Desist Order must be complied with by December 31, 2015.

Existing Conditions and Project Impact – Health

The construction of the Wastewater Treatment Plant Improvements Project in Holtville will reduce any health risks that may be associated with exposure to inadequately treated wastewater discharges. According to the "World Health Organization Water, Sanitation and Hygiene Links to Health FACTS AND FIGURES – November 2004 edition", sanitation projects can have the following benefits to human health:

- Improved sanitation reduces diarrhea morbidity by 32%.
- Access to safe water and sanitation facilities and better hygiene practice can reduce morbidity from Ascariasis by 29%.

Water borne diseases are caused by pathogenic microorganisms that are transmitted as a result of inadequate wastewater disposal practices and unsafe water supplies. An individual can become ill after drinking water that has been contaminated with these organisms, eating uncooked foods that have been in contact with contaminated water, or through poor hygiene habits that contribute to the dissemination of diseases by direct or indirect human contact. Table 4 shows waterborne statistics for Imperial County in California.

Table 4
WATERBORNE STATISTICS FOR IMPERIAL COUNTY, CALIFORNIA

Disease	Number or Annual Cases				
	2011	2010	2009	2008	2007
Amebiasis	3	0	0	0	0
Campylobacteriosis	40	33	18	19	23
Coccidioidomycosis	1	4	9	8	11
Cryptosporidiosis	0	1	0	0	0
Giardiasis	0	1	0	3	2
Shigellosis	16	49	21	24	18

Source: California Department of Public Health, Infectious Disease Office.

According to the World Health Organization (WHO), ammonia may have a toxic effect on healthy humans if the intake becomes higher than the capacity to detoxify. However, more specifically, high levels of ammonia in the receiving water bodies cause an immediate risk to aquatic life.

Transboundary Effects

The effluent discharges north to the Pear Drain and eventually reaches the Salton Sea, Therefore, no transboundary impacts are anticipated within or around the region. The environmental impacts resulting from the implementation of the Project will be positive overall, since the Project will upgrade the WWTP and replace deteriorated infrastructure, reducing the risk for water resource contamination and improving the quality of life of the residents by reducing potential health risks. The International Boundary and Water Commission has reviewed the Project and has determined that they have no concerns with the Project as planned.

2.3 FINANCIAL CRITERIA

The total estimated cost of the Project is US$11,017,300 which includes the funding for construction, supervision, and contingencies. The Project meets all BEIF program criteria and has been approved by EPA for a BEIF grant of up to US$3,559,910 for the Wastewater Treatment Plant Improvements to complete the financing of the Project. Table 5 presents a breakdown of total Project costs, as well as the source of funds.

Table 5
USES AND SOURCES OF FUNDS
(US$)

Uses	Amount	%
Construction, contingencies, supervision and other	$11,017,300	100.0
TOTAL	**$11,017,300**	**100.0**
Sources	**Amount**	**%**
CWSRF*-California Loan	$3,457,390	31.4
CWSRF-California Grant	4,000,000	36.3
NADB-BEIF Grant	3,559,910	32.3
TOTAL	**$11,017,300**	**100.0**

*Clean Water State Revolving Fund (CWSRF) Program

3 PUBLIC ACCESS TO INFORMATION

3.1 PUBLIC CONSULTATION

BECC published the draft certification proposal for a 30-day public comment period beginning December 16, 2013. The following Project documentation was made available upon request:

- Preliminary Engineering Report for a Wastewater Treatment Plant Upgrades for the City of Holtville, September, 2011.
- Categorical Exclusion signed by EPA Region 9 on January 4th, 2013.
- Notice of Exemption from CEQA posted on November 29th, 2010 by Imperial County.
- Final Design Wastewater Treatment Plant Improvements Project, City of Holtville, CA, prepared by Lee & Ro, Inc., August 2013
- Public Meeting Minutes, pictures, articles and materials.

The public comment period ended on January 15, 2014, with no comments received.

3.2 OUTREACH ACTIVITIES

The city of Holtville conducted extensive outreach efforts to communicate the Project's characteristics, including cost and fees and to obtain the support of the residents of the Project's service area. In accordance with the public outreach requirements of the U.S.-Mexico Border Water Infrastructure Program, activities such as the use of a local steering committee, public meetings, and appropriate project information access where conducted as described in the Public Participation Plan (PPP). The following information provides a summary of the outreach activities carried out for the Projects.

The Local Steering Committee was formed on April 9, 2013. The steering committee included members of the sponsor's staff, planning commission and city council. The steering committee developed a public participation plan and periodically met with the Project team throughout the development period to help the project sponsor to disseminate information regarding the Projects. The Project's technical and financial information was made available to the public for review. The Local Steering Committee, with assistance from the Project sponsor, prepared a fact sheet and a presentation on the Projects. Information on the Project was presented to the community during two public meetings.

The first Public Meeting notice was held on July 15, 2013 at the Holtville City Hall. Based on the sign-in sheet, the meeting was attended by seven (7) individuals. This meeting informed the residents of the Project's characteristics, potential funding sources, impact fees and monthly costs related to the wastewater treatment plant improvements project. All participants voted in support of the project.

A notice of second public meeting was posted on September 3, 2013 and the meeting was held at the City Hall, on October 14, 2013.The purpose of the meeting was to present the final project design, anticipated project benefits and final estimated costs. The meeting gave citizens the opportunity to make their comments known. There was an attendance of nine (9) Holtville residents, all of which expressed their support of the Project. On October 14, 2013, The Imperial Valley Press published an article covering the meeting, explaining the financial aspects and updating design plans.

A third public meeting was held November 25, 2013 to describe the financial structure and any potential economic impacts of the Project on the community. The presentation was given during a regular meeting of the Holtville City Council and received no public comments from the audience.